

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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**CHAPTER 11**

**GRIMM BROTHERS REALTY  
CO.,**

**BANKRUPTCY NO. 17-13697-MDC**

**Debtor.**

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**JOINDER OF MONTGOMERY COUNTY TAX CLAIM BUREAU  
TO THE RESPONSES OF THE UNITED STATES TRUSTEE AND THE  
NORRISTOWN MUNICIPAL WASTE AUTHORITY IN OPPOSITION TO  
DEBTOR'S MOTION FOR RECONSIDERATION OF COURT ORDER  
OF MAY 15, 2020 CONVERTING CASE TO CHAPTER 7**

Montgomery County Tax Claim Bureau ("MCTCB"), by and through its undersigned counsel, Obermayer Rebmann Maxwell & Hippel LLP, hereby joins to the Responses the United States Trustee (the "Trustee") and the Norristown Municipal Waste Authority (the "Waste Authority") in Opposition to Debtor's Motion for Reconsideration of Court Order of May 15, 2020 Converting Case to Chapter 7, and in support thereof, states as follows:

1. On or about May 26, 2017 (the "Petition Date"), the Debtor filed a voluntary petition for relief under Chapter 11 of the United States Bankruptcy Code, 11 U.S.C. § 101 *et seq.* (as amended, the "Bankruptcy Code").
2. On or about August 24, 2017, the Trustee filed a motion to convert this case to a chapter 7 or in the alternative to dismiss the case with a bar to refiling [Docket No. 36].
3. On or about December 9, 2019, the Trustee filed a supplement to its motion to convert or in the alternative to dismiss [Docket No. 226].
4. After the hearing on the UST's Motion on May 13, 2020, this Court entered an Order converting the case to Chapter 7 on May 15, 2020 [Docket No. 312].

5. Thereafter, Debtor filed a pro se Motion for Reconsideration of the Court's Order of May 15, 2020 Converting Case to Chapter 7 (the "Motion") [Docket No. 333] and Supplement thereto (the "Supplement") [Docket No. 380].

6. On or about July 10, 2020, the Trustee filed an objection in response to Debtor's Motion and the Supplement [Docket No. 395].

7. The Waste Authority also filed a response to Debtor's Motion and the Supplement on or about July 14, 2020 [Docket No. 398].

8. MCTCB files this joinder to the responses of the Trustee and the Waste Authority to Debtor's Motion and hereby incorporates the responses including all factual and legal arguments and affirmative defenses as if fully set forth herein.

9. MCTCB specifically reserves the right to make argument, introduce evidence and elicit testimony at the hearing on the Motion on any and all issues raised therein.

WHEREFORE, MCTCB respectfully requests this Court deny the Motion together with such other relief this Court deems necessary and appropriate.

Respectfully submitted,

Dated: July 14, 2020

By: /s/ Michael D. Vagnoni  
Michael D. Vagnoni, Esquire  
OBERMAYER REBMANN MAXWELL & HIPPEL LLP  
Centre Square West, Suite 3400  
1500 Market Street  
Philadelphia, PA 19102  
Telephone: (215) 665-3066  
Facsimile: (215) 665-3165